

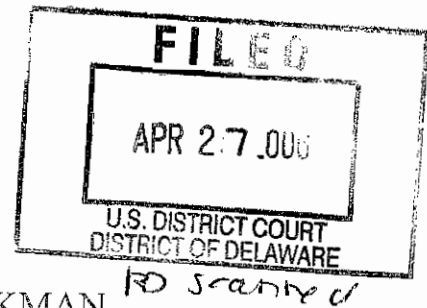
IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

STEVE HICKMAN
Plaintiff,

V.

CONSOLIDATED
Civil Act. No.: 05-811-kaj
Civil Act. No.: 05-839-kaj

DETECTIVE MARZEC in his individual
And official capacity, DAVID HUME IV, TOWN
OF DELMAR, DEPARTMENT OF DRUG
ENFORCEMENT, AGENT TOM JACOBS
AND AGENT CHRIS QUAGLINO
Defendants.



MEMORANDUM FOR STEVE HICKMAN

NOW COMES, the Plaintiff, Steve Hickman, pro se, who respectfully moves this Honorable Court with the following:

1. Detective Marzec and Agent Tom Jacobs have committed perjury and misrepresented the facts known to them throughout the course of the above case.

A. Both Marzec and Jacobs both submitted affidavits sworn under the penalty of perjury that were factually untrue. *See Attachments* ~~A-1 and A-2~~ *and A-3*

2. Both Detective Marzec and Agent Tom Jacobs stated that they believed Steve Hickman lived at a residence located in Ellendale, Delaware and not Lincoln, Delaware.

A. Detective Marzec prepared a report that was dated July 05, 2005, three (3) months prior to submitting his false affidavit, that clearly states the opposite as well as verifies that he and Jacobs both knew that Hickman resided in Lincoln, Delaware. Thus, invalidating the search warrant on September 21, 2005 in Hickman's case and proving that the affidavits submitted by Marzec and Jacobs were made with false intentions. *See Attachments B-1 and B-2*

Paragraph #4 reads:

"At approximately 1:15 p.m., Hickman traveled from his Greentop Road residence Lincoln, Delaware enroute to Ellendale, Delaware. Observed by TFO Marzec."

Paragraph #15 reads:

"At approximately 4:42 p.m., Hickman was observed operating the blue Cadillac departing from "The Hole". Hickman was observed traveling to his residence on Greentop Road Lincoln, Delaware."

3. In Ellendale, Delaware there does exist a trailer that is tan/beige in color with a white trim which was also identified as a Sales/Packaging trailer.

A. Marzec's investigation determined that drugs were probably being sold at this particular location due to the high traffic flow. *See Attachment C-4, Paragraph #7*

4. The reasoning and rationale behind the confusion and outright perjury in this case is simple. Marzec had evidence and information for the Sales/Packaging trailer located in the Ellendale, Delaware area but wanted to raid the Lincoln, Delaware residence in which Hickman resides. Hickman's residence is actually a double wide that is not of a tan/beige color. Marzec's scheme backfired on him and is proven throughout all of his documents. He and other officials has information to raid the Sales/Packaging trailer located in Ellendale, Delaware. Not the Hickman's residence located in Lincoln, Delaware.

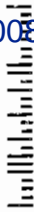
5. Marzec not only violated Hickman's constitutional rights and the rights of those who were present at his residence at the time of the home raid, but he crossed the ethics of a good and well trained officer with lies and deception. This Honorable Court should grant Hickman relief from all claims that Marzec has presented against him. Marzec and Jacobs have both failed to abide by state and federal laws by committing perjury. All the evidence has been submitted.

Respectfully submitted,

Steve Hickman



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Steve Hurlburt
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Lincoln, NE

1996

Clerk

U.S. District Court

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Wilmington DE

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